

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CATHOLIC LEGAL IMMIGRATION
NETWORK, INC.,

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendant.

Case No. 8:19-cv-01511-TDC

CONSENT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Defendant, the United States Citizenship and Immigration Services (the “Defendant”), through its counsel, Robert K. Hur, United States Attorney for the District of Maryland, and Alan C. Lazerow, Assistant United States Attorney for that district, submits this *Consent Motion to Extend Time to Respond to Complaint* (the “Motion”).

1. On May 22, 2019, Catholic Legal Immigration Network, Inc. (the “Plaintiff”) filed the *Complaint for Declaratory and Injunctive Relief*, see ECF No. 1 (the “Complaint”), seeking to compel Defendant to disclose records Plaintiff requested under the Freedom of Information Act, 5 U.S.C. § 522 (“FOIA”).

2. The United States Attorney’s Office for the District of Maryland received a copy of the Complaint and summons on May 24, 2019. Thus, under 5 U.S.C. § 552(a)(4)(C), Defendant’s deadline to respond is June 24, 2019.

3. On June 18, 2019, Defendant responded to Plaintiff’s FOIA request and produced responsive documents. Defendant released 824 pages in full, released 453 pages in part, and withheld 132 pages.

4. Defendant requires additional time to respond to the Complaint. Undersigned counsel has conferred with Plaintiff's counsel, and Plaintiff consents to an extension of thirty (30) days, *i.e.* through July 24, 2019 (the "Response Deadline"). The parties contemplate that, during that time, they will confer and attempt to narrow the scope of the issues to be briefed in summary judgment motions. The parties further contemplate this, by the Response Deadline, they will either (i) propose a summary-judgment briefing schedule, or (ii) if the parties have not been able to narrow the scope of the issues in summary judgment motions, request additional time to so narrow the issues.

5. Michelle S. Grant, Esq., counsel for the Plaintiff, consents to the relief Defendant seeks in the Motion.

WHEREFORE, Defendant requests that the Court grant the Motion and extend the deadline for Defendant to respond to the Complaint through July 24, 2019.

Respectfully submitted,

Robert K. Hur
United States Attorney

By: /s/
Alan C. Lazerow (Bar No. 29756)
Assistant United States Attorney
36 S. Charles St., 4th Floor
Baltimore, Maryland 21201
(410) 209-4800
Alan.Lazerow@usdoj.gov

Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on this 23rd day of June, 2019, a copy of the *Consent Motion to Extend Time to Respond to Complaint* was electronically served on all parties receiving CM/ECF notices in this case.

_____/s/
Alan C. Lazerow
Assistant United States Attorney